

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

CITIBANK, N.A., AS TRUSTEE FOR  
AMERICAN HOME MORTGAGE ASSETS  
TRUST 2006-3, MORTGAGE BACKED  
PASS-THROUGH CERTIFICATES SERIES  
2006-3,

Plaintiff,

v.

C.A. No. 1:18-cv-00427-JJM

KATHERINE L. CAITO,

Defendant,

v.

INTERNAL REVENUE SERVICE,

Interested Party.

**PLAINTIFF’S OBJECTION TO DEFENDANT KATHERINE L. CAITO’S SUMMARY  
JUDGMENT MOTION**

Plaintiff, Citibank, N.A., as Trustee for American Home Mortgage Assets Trust 2006-3, Mortgage Backed Pass-Through Certificates Series 2006-3 (“Citibank, as Trustee”), objects to and opposes Defendants’ Motion for Summary Judgment.

In support of its motion, Plaintiff submits an accompanying Memorandum of Law, Plaintiff’s Response to Statement of Undisputed Facts in Support of Summary Judgment, and Affidavit in Support of Plaintiff’s Opposition to Defendants’ Motion for Summary Judgment.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Plaintiff respectfully requests oral argument on both Motions for Summary Judgment.

Respectfully submitted,

CITIBANK, N.A., AS TRUSTEE FOR  
AMERICAN HOME MORTGAGE ASSETS  
TRUST 2006-3, MORTGAGE BACKED  
PASS-THROUGH CERTIFICATES SERIES  
2006-3,

By: Its Attorneys,

/s/ Samuel C. Bodurtha

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Dated: July 15, 2019

**CERTIFICATE OF SERVICE**

I, Samuel C. Bodurtha, certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 15, 2019.

/s/ Samuel C. Bodurtha

Samuel C. Bodurtha